

**U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Case No.: 20-10070 elf
Roderick T Meer	Chapter 13
	:
	:
Debtor.	:
	:
	:

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Sirs:

Debtor, by and through his undersigned attorney, hereby responds to Wilmington Savings Fund Society, FSB d/b/a Christiana Trust, not individually but as trustee for Premium Mortgage Acquisition Trust's (hereinafter "Lender") Motion for Relief of the Automatic Stay and in support thereof states the following:

1. Due to COVID-19 and the Order of the Governor of the Commonwealth of Pennsylvania For Individuals to Stay at Home, attached herewith as Exhibit A, Debtor's employment as a salesman is considered to be non-essential and he is unable to work at this time.
2. In light thereof, Debtor attempted to contact Lender to request a forbearance agreement. Due to the extended time on hold, Debtor was not able to reach a representative by telephone to request said forbearance. Debtor was, however, able to file a forbearance request through Lender's email portal, see attached Exhibit B.
3. Lender's automated message confirms receipt of Debtor's forbearance request and further states that Lender "will respond within 10 business days." See Exhibit B.

4. Accordingly, Debtor respectfully requests that Lender's Motion for Relief from the Automatic Stay be denied, or alternatively, deferred until Lender submits its response to Debtor regarding Debtor's forbearance request.

WHEREFORE, the Debtor requests this Honorable Court Order deny Wilmington Savings Fund Society, FSB d/b/a Christiana Trust, not individually but as trustee for Premium Mortgage Acquisition Trust's Motion for Relief from the Automatic Stay, or grant such other relief that this Court deems just and proper.

Dated: April 28, 2020

/s/ George R Tadross

George R Tadross, Esquire  
128 Chestnut Street, Suite 204  
Philadelphia, PA 19106  
215-500-5000 (phone)  
267-885-2377 (fax)  
Attorney for Debtor

# Exhibit A



**ORDER OF  
THE GOVERNOR OF THE COMMONWEALTH OF PENNSYLVANIA  
FOR INDIVIDUALS TO STAY AT HOME**

*WHEREAS, the World Health Organization and the Centers for Disease Control and Prevention ("CDC") have declared a novel coronavirus ("COVID-19") a "public health emergency of international concern," and the U.S. Department of Health and Human Services ("HHS") Secretary has declared that COVID-19 creates a public health emergency; and*

*WHEREAS, as of March 6, 2020, I proclaimed the existence of a disaster emergency throughout the Commonwealth pursuant to 35 Pa. C.S. § 7301(c); and*

*WHEREAS, I am charged with the responsibility to address dangers facing the Commonwealth of Pennsylvania that result from disasters. 35 Pa. C.S. § 7301(a); and*

*WHEREAS, in addition to general powers, during a disaster emergency I am authorized specifically to control ingress and egress to and from a disaster area and the movement of persons within it and the occupancy of premises therein. 35 Pa. C.S. § 7301(f); and*

*WHEREAS, in executing the extraordinary powers outlined above, I am further authorized during a disaster emergency to issue, amend and rescind executive orders, proclamations and regulations and those directives shall have the force and effect of law. 35 Pa. C.S. § 7301(b); and*

*WHEREAS, in addition to my authority, my Secretary of Health has the authority to determine and employ the most efficient and practical means for the prevention and suppression of disease. 71 P.S. § 532(a), 71 P.S. 1403(a); and*

*WHEREAS, these means include isolation, quarantine, and any other control measure needed. 35 P.S. § 521.5.*

*NOW THEREFORE, pursuant to the authority vested in me and my Administration by the laws of the Commonwealth of Pennsylvania, I do hereby ORDER and PROCLAIM as follows:*

**Section 1: Order to Stay at Home**

*All individuals residing in Allegheny County, Bucks County, Chester County, Delaware County, Monroe County, Montgomery County, and Philadelphia County are ordered to stay at home except as needed to access, support, or provide life sustaining business, emergency, or government services. For employees of life sustaining businesses that remain open, the following child care services may remain open: group and family child care providers in a residence; child care facilities operating under a waiver granted by the Department of Human Services Office of Child Development and Early Learning; and, part-day school age programs operating under an exemption from the March 19, 2020 business closure Orders.*

*A list of life sustaining businesses that remain open is attached to and incorporated into this Order. In addition, businesses that are permitted to remain open include those granted exemptions prior to or following the issuance of this Order.*

*Individuals leaving their home or place of residence to access, support, or provide life sustaining services for themselves, another person, or a pet must employ social distancing practices as defined by the Centers for Disease Control and Prevention. Individuals are permitted to engage in outdoor activities; however, gatherings of individuals outside of the home are generally prohibited except as may be required to access, support or provide life sustaining services as outlined above.*

*Enforcement of this Order will commence at 8:00 PM on Monday, March 23, 2020.*

***Section 2: Effective Date and Duration***

*This order is effective immediately and will remain in effect for a period of two weeks, specifically until April 6, 2020.*



*GIVEN under my hand and the Seal of the Governor, at the city of Harrisburg, on this twenty-third day of March two thousand twenty, the year of the commonwealth the two hundred and forty-fourth.*

*Tom Wolf*  
TOM WOLF  
Governor

# Exhibit B

Subject: We've Received Your Request



**DO NO REPLY** <wordpress@rushmorelm.com>  
to rtmeer

11:21 AM (9 hours ago)

You are viewing an attached message. Law Office Mail can't verify the authenticity of attached messages.

Dear Roderick,

This message is to acknowledge our receipt of your request for assistance based on financial impact from COVID-19. Please note, there is no need to contact us, we have received your application and it is under review. We will respond within 10 business days . We appreciate your patience as we work to provide you with an accurate and timely response.

Sincerely,

Rushmore Loan Management Services